

December 14, 2009

Colorado Department of Public Health and Environment HMWMD-RP-D2 4300 Cherry Creek Drive South Denver, Colorado 80222-1530

Attention: Mr. Mark Rudolph

Subject: Addendum #1 - Investigation Report, Identification and Confirmation of Soils Requiring Long Term Management, Valmont Butte, Boulder, Colorado

Dear Mr. Rudolph:

On behalf of the City of Boulder, Casey Resources, Inc. (CRI) has prepared this Addendum #1 to the report entitled "Investigation Report, Identification and Confirmation of Soils Requiring Long Term Management" (Investigation Report) provided to the Colorado Department of Public Health & Environment (CDPHE) on November 24, 2009. Addendum #1 has been prepared to address two previous verbal comments from CDPHE personnel. These are as follows:

- 1. Provide a figure that combines the 50-foot grid investigation areas (Investigation Report Figure 7) and the 200-foot grid sampling location layout (Investigation Report Figure 4), and
- 2. The west end of the North Hillside should be included in the screening of the North Hillside. Please provide surface soil sampling data for this area.

These two comments are addressed as follows:

Response to Comment #1

In response to Comment #1, we have attached "Figure A 50 Foot Investigation Areas and 200 Foot Grid Sampling Locations Overlay". As presented in the Investigation Report, the 50 Foot Investigation Areas were not screened on an established 50 foot grid primarily due to physical constraints (structures, vegetation, topography, etc); however, these areas were screened at close spacing (25 feet or less) between sampling locations.

Response to Comment #2

On November 25, 2009, CRI personnel completed in-situ surface soil sampling along the west end of the North Hillside at Valmont Butte (Figure 1-A). The area to the east had previously



been screened and presented in the Investigation Report (see Figure 8 Lead Investigation - North Hillside). The in-situ sampling measurements for possible lead and arsenic concentrations in surface soil were collected using a portable X-ray Fluorescence Spectrometer (XRF). A total of 32 surface readings were taken at intervals of approximately 100 feet or less. The measurement locations are shown on Figure 1-A and the measurement results are presented on Table 1-A. The results provided on Table 1-A include adjusted (corrected) concentrations for arsenic and lead based on the correction factors discussed in the Investigation Report (see Appendix A of the Investigation Report). As shown on Table 1-A, lead concentrations in this screening area were less than the lead screening value of 800 milligrams per kilograms (mg/Kg).

We trust that the information provided in this letter addresses your comments. Please contact Paul Casey or me with any comments or questions.

Sincerely,

CASEY RESOURCES, INC.

Terry O. McGowan, P.G.

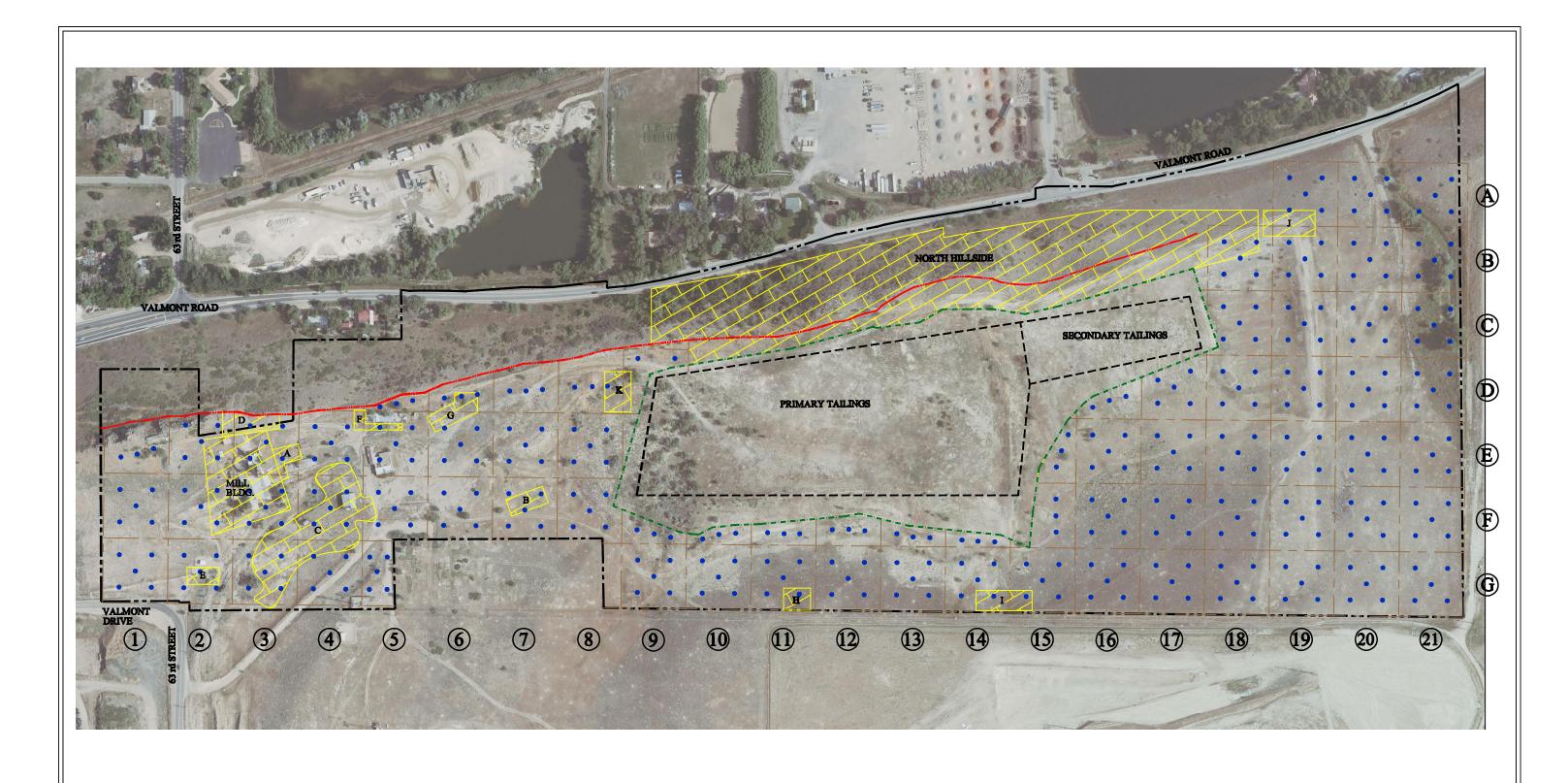
Associate

Attachments: Figure A and Figure 1-A

Table 1-A

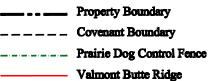
cc: Edgar Ethington, CDPHE
Maureen Rait, City of Boulder
Bill Boyes, City of Boulder

Elizabeth Temkin, TWH





EXPLANATION



A 50-Foot Grid Sampling Area

200-Foot Grid and Soil Sample Locations

Valment Butte Property Boundary based on April 14, 2000 Land Survey Plat

FIGURE A

"50 FOOT INVESTIGATION AREAS AND 200 FOOT GRID SAMPLING LOCATIONS OVERLAY" **VALMONT BUTTE PROPERTY** 3000 NORTH 63rd STREET BOULDER, COLORADO





EXPLANATION

- Lead Concentration 800 mg/Kg or greater Lead Concentration Less Than 800 mg/Kg

Note: mg/Kg = Milligrams per Kilogram



FIGURE 1-A

LEAD INVESTIGATION – WEST END OF NORTH HILLSIDE VALMONT BUTTE PROPERTY 3000 NORTH 63RD STREET **BOULDER, COLORADO**

TABLE 1-A
West End of North Hillside Lead and Arsenic Data

Sample Location	Date	As	As +/-	Pb	Pb +/-	As Adjusted	Pb Adjusted
1	25-Nov-09	<lod< td=""><td>22</td><td>349</td><td>9</td><td>< 19</td><td>394</td></lod<>	22	349	9	< 19	394
2	25-Nov-09	<lod< td=""><td>12</td><td>195</td><td>5</td><td>< 11</td><td>230</td></lod<>	12	195	5	< 11	230
3	25-Nov-09	<lod< td=""><td>22</td><td>102</td><td>8</td><td>< 19</td><td>126</td></lod<>	22	102	8	< 19	126
4	25-Nov-09	<lod< td=""><td>36</td><td>684</td><td>15</td><td>< 32</td><td>735</td></lod<>	36	684	15	< 32	735
5	25-Nov-09	<lod< td=""><td>21</td><td>215</td><td>8</td><td>< 18</td><td>252</td></lod<>	21	215	8	< 18	252
6	25-Nov-09	<lod< td=""><td>21</td><td>224</td><td>8</td><td>< 18</td><td>262</td></lod<>	21	224	8	< 18	262
7	25-Nov-09	<lod< td=""><td>21</td><td>246</td><td>8</td><td>< 18</td><td>285</td></lod<>	21	246	8	< 18	285
8	25-Nov-09	<lod< td=""><td>18</td><td>170</td><td>7</td><td>< 16</td><td>203</td></lod<>	18	170	7	< 16	203
9	25-Nov-09	<lod< td=""><td>23</td><td>233</td><td>9</td><td>< 20</td><td>271</td></lod<>	23	233	9	< 20	271
10	25-Nov-09	<lod< td=""><td>25</td><td>244</td><td>10</td><td>< 22</td><td>283</td></lod<>	25	244	10	< 22	283
11	25-Nov-09	<lod< td=""><td>18</td><td>135</td><td>7</td><td>< 16</td><td>164</td></lod<>	18	135	7	< 16	164
12	25-Nov-09	<lod< td=""><td>18</td><td>144</td><td>7</td><td>< 16</td><td>174</td></lod<>	18	144	7	< 16	174
13	25-Nov-09	<lod< td=""><td>14</td><td>58</td><td>5</td><td>< 12</td><td>75</td></lod<>	14	58	5	< 12	75
14	25-Nov-09	<lod< td=""><td>11</td><td>67</td><td>4</td><td>< 10</td><td>86</td></lod<>	11	67	4	< 10	86
15	25-Nov-09	<lod< td=""><td>14</td><td>75</td><td>5</td><td>< 12</td><td>95</td></lod<>	14	75	5	< 12	95
16	25-Nov-09	<lod< td=""><td>27</td><td>164</td><td>10</td><td>< 24</td><td>196</td></lod<>	27	164	10	< 24	196
17	25-Nov-09	<lod< td=""><td>18</td><td>145</td><td>7</td><td>< 16</td><td>175</td></lod<>	18	145	7	< 16	175
18	25-Nov-09	<lod< td=""><td>20</td><td>143</td><td>8</td><td>< 18</td><td>173</td></lod<>	20	143	8	< 18	173
19	25-Nov-09	<lod< td=""><td>19</td><td>131</td><td>7</td><td>< 17</td><td>159</td></lod<>	19	131	7	< 17	159
20	25-Nov-09	<lod< td=""><td>20</td><td>502</td><td>8</td><td>< 18</td><td>552</td></lod<>	20	502	8	< 18	552
21	25-Nov-09	<lod< td=""><td>19</td><td>139</td><td>7</td><td>< 17</td><td>168</td></lod<>	19	139	7	< 17	168
22	25-Nov-09	<lod< td=""><td>29</td><td>360</td><td>11</td><td>< 25</td><td>406</td></lod<>	29	360	11	< 25	406
23	25-Nov-09	<lod< td=""><td>19</td><td>110</td><td>7</td><td>< 17</td><td>136</td></lod<>	19	110	7	< 17	136
24	25-Nov-09	<lod< td=""><td>16</td><td>103</td><td>6</td><td>< 14</td><td>128</td></lod<>	16	103	6	< 14	128
25	25-Nov-09	<lod< td=""><td>19</td><td>232</td><td>7</td><td>< 17</td><td>270</td></lod<>	19	232	7	< 17	270
26	25-Nov-09	<lod< td=""><td>13</td><td>83</td><td>5</td><td>< 11</td><td>104</td></lod<>	13	83	5	< 11	104
27	25-Nov-09	<lod< td=""><td>16</td><td>43</td><td>6</td><td>< 14</td><td>57</td></lod<>	16	43	6	< 14	57
28	25-Nov-09	<lod< td=""><td>15</td><td>72</td><td>6</td><td>< 13</td><td>92</td></lod<>	15	72	6	< 13	92
29	25-Nov-09	<lod< td=""><td>19</td><td>117</td><td>7</td><td>< 17</td><td>143</td></lod<>	19	117	7	< 17	143
30	25-Nov-09	<lod< td=""><td>14</td><td>116</td><td>5</td><td>< 12</td><td>142</td></lod<>	14	116	5	< 12	142
31	25-Nov-09	<lod< td=""><td>13</td><td>71</td><td>5</td><td>< 11</td><td>90</td></lod<>	13	71	5	< 11	90
32	25-Nov-09	<lod< td=""><td>9</td><td>23</td><td>3</td><td>< 8</td><td>32</td></lod<>	9	23	3	< 8	32

All concentration values are in milligrams per kilogram as measured by X-ray Fluorescence (XRF)

<LOD - Less than the "Level of Detection" As +/- and Pb +/- represent the detection limits associated with XRF results As - Arsenic

Pb - Lead

Red - Adjusted lead concentration* greater than 800 mg/Kg (lead action concentration)

Adjusted lead concentrations* with no color are less than 800 mg/Kg

Note: Where the arsenic concentration was less than LOD, the LOD was used to obtain the adjusted value

^{**} Arsenic concentrations by XRF analysis adjusted to presumed laboratory values via regression analysis formula



^{*} Lead concentrations by XRF analysis adjusted to presumed laboratory values via regression analysis formula